

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 21-21598-JAD
Gale Phay Zilko, : Chapter 13
Debtor, :
: Document No.
Ronda J. Winnecour, :
Movant, :
: vs. :
: :
Gale Phay Zilko, :
Respondent. : :

**ANSWER TO TRUSTEE'S CERTIFICATE OF DEFAULT REQUESTING DISMISSAL
OF CASE**

AND NOW comes the Debtor, Gale Phay Zilko, by and through her attorney, Dennis J. Spyra, Esq., and files this response to the Chapter 13 Trustee's Certificate of Default Requesting Dismissal of Case, averring as follows:

1. Admitted.
2. Admitted.
3. Admitted.

New Matter

4. Debtor paid \$1,300.00 on April 30, 2023 to fund her plan. Debtor will begin making monthly payments of \$2,300.00 with the May 2023 payment. Attached hereto and made a part hereof and marked as Exhibit A is a printout from the Chapter 13 website showing the payment. Debtor has informed the undersigned that she will not be able to pay the required monthly payment to cure the arrearages over the remaining number of months under the plan.

5. Debtor will make her best effort to devote as much of her income as possible to pay her creditors under the plan.
6. Debtor believes and therefore avers that in the future she will be able to refinance her property and pay her creditors in full before the end of the plan.

WHEREFORE, the Debtor files this answer to the Chapter 13 Trustee's Motion to Dismiss Case.

Respectfully Submitted,

/s/ Dennis J. Spyra, Esq.
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